



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

MAR 11 2014

Randall Towns, President
All Metals Recycling, Inc.
2141 Vermont Route 15W
Hardwick, VT 05843

Re: Clean Air Act Reporting Requirement

Dear Mr. Towns:

The United States Environmental Protection Agency ("EPA") is evaluating whether All Metals Recycling, Inc. ("AMR") located at 2141 Vermont Route 15 in Hardwick, Vermont is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act. These include; the National Emission Standards for Hazardous Air Pollutants found at 40 CFR Part 63; the Stratospheric Ozone regulations found at 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction, and the federally enforceable Vermont State Implementation Plan.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

Therefore, within 60 days of the date AMR receives this reporting requirement, AMR is required to provide all of the information outlined below. Specifically, provide a separate response to each numbered paragraph or subparagraph below. Where possible, provide responses in an electronic spreadsheet format (preferably Microsoft Excel).

1. Provide the following ownership information:
 - a. List the name, address, and a brief description of the operations conducted at each facility that AMR owns and/or operates in New England;
 - b. Describe the ownership and business structure;

- c. Indicate the date and state of incorporation;
- d. List any partners or corporate officers;
- e. List any parent and subsidiary corporations; and
- f. Provide the number of employees and SIC codes for the type of work conducted at each facility.

For each facility owned or operated by AMR:

2. Provide the following production and air pollution emission information:
 - a. The annual quantity of scrap metal received at the facility in 2011, 2012 and 2013;
 - b. The annual quantity of metal shipped offsite and/or sold in 2011, 2012, and 2013;
 - c. Annual emissions (in tons per year) from the facility of volatile organic compounds (VOCs) in 2011, 2012, and 2013;
 - d. Annual emissions (in tons per year) from the facility of hazardous air pollutants (HAPs) in 2011, 2012, and 2013;
 - e. The method used to calculate annual emissions, including any emission factors used and their basis. Provide copies of any air emission test reports.
3. Explain in detail how the facility ensures that all fluids have been drained or removed from motor vehicles prior to shredding/crushing at the facility or prior to shipment elsewhere for processing. Specifically:
 - a. Provide copies of any standard operating procedures, records from upstream suppliers, records to downstream recipients, etc.;
 - b. Regarding removal of refrigerants in air conditioning units in motor vehicles:
 - i. Does the facility have certified technicians who use certified equipment? If so, provide copies of:
 1. The technician's certification; and
 2. The recovery equipment registration.
4. Provide the following information about each piece of metal cutting equipment (e.g., shears, shredders). Include any metal cutting equipment that has been taken out of service:
 - a. The make, model, and dimensions of the unit;
 - b. The date the equipment was purchased;
 - c. The date the equipment began operating;
 - d. The date the equipment was removed from service (if relevant);
 - e. The maximum conveyor speed and width;
 - f. The maximum throughput capacity of the unit (in pounds scrap per hour); and
 - g. The average annual throughput from 2009 to 2013.

5. Provide the following information about each piece of combustion equipment, other than internal combustion engines. Include any combustion equipment that has been taken out of service:
 - a. The name of the manufacturer, model number, and rated capacity of the combustion equipment;
 - b. The date the combustion equipment was purchased;
 - c. The date the installation of the combustion equipment was completed;
 - d. The date the combustion equipment began operating;
 - e. The date the combustion equipment was taken out of service (if relevant); and
 - f. The type and amount of fuel burned by the combustion equipment from January 1, 2011 to December 31, 2013.
6. Provide the following information about each stationary source reciprocating internal combustion engine ("RICE"). Note that a stationary RICE is "any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICEs differ from mobile RICEs in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition," (see 40 CFR 63.6585):
 - a. The manufacturer and model number;
 - b. The type and quantity of fuels burned;
 - c. The year the RICE were purchased and installed;
 - d. The purpose of the RICE (e.g., for emergency power or primary power);
 - e. The number of hours per year that the RICE operated; and
 - f. The number of hours each RICE ran to produce electricity for use on-site or for sale to another entity.
7. Does the facility have a secondary aluminum smelting furnace (i.e., a "sweat furnace")? If so:
 - a. Indicate whether the sweat furnace has an afterburner;
 - b. Provide copies of any monitoring plans; and
 - c. Provide copies of any test reports;
8. Does the facility own "roll off" metal storage containers ("bins")? If so, provide a list of all bins (including bins stored at off-site locations).
9. For any equipment resurfacing, painting, or cleaning operations of vehicles, barrels, roll-off bins, metal parts, scrap metal storage boxes, shipping containers, etc. provide:
 - a. A list of the make, model, and capacity (in gallons per hour) of all spray guns;
 - b. The date of acquisition of the spray gun;
 - c. The date the spray gun was removed from service (if relevant);
 - d. A list of the types of coatings used, including the VOC and HAP content of each coating (in pounds per gallon);

- e. A list of all coatings containing any of the following HAPs: chromium (Cr); lead (Pb); manganese (Mn); nickel (Ni); or cadmium (Cd).
- f. For any solvent-based degreasing units or parts washers used to clean metal parts, provide:
 - i. The make, model, capacity (in gallons) of each unit; and
 - ii. The material safety data sheet (MSDS) for the solvent used in each unit.

10. Provide a list of all capital expenditures greater than \$100,000 from January 1, 2000 to the present. This list should contain:

- a. The type of equipment, including the name of the manufacturer, model number, size of the equipment, production rate, and any other operational specifications of the equipment;
- b. A brief description of each project;
- c. The date the equipment was purchased;
- d. The date the installation of the equipment was completed; and
- e. The date the equipment began operating at the facility.

Be aware that if AMR does not provide the information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

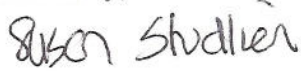
You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Susan Studlien
US EPA Region 1
Mail Code OES04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912
Attn: Abdi Mohamoud

If you have any questions regarding this Reporting Requirement, please contact Abdi Mohamoud at (617) 918-1858, or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,

A handwritten signature in dark ink, appearing to read "Susan Studlien". The signature is written in a cursive, slightly slanted style.

Susan Studlien, Director
Office of Environmental Stewardship

cc: John Wakefield, VT DEC